

The Talaria Company, LLC.)
d/b/a The Hinckley Company)
Hancock County)
Southwest Harbor, Maine)
A-754-71-B-A

Departmental
Finding of Fact and Order
Air Emission License
Amendment #1

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

The Talaria Company, LLC d/b/a The Hinckley Company (Hinckley) of Southwest Harbor, Maine has applied for a minor revision to its Chapter 115 air emission license, A-754-71-A-N. Hinckley has requested to include several small boilers/heaters to its air emission license.

II. REVISION DESCRIPTION

A. Additional Boilers

Hinckley has requested an amendment to add eight fuel-burning devices to their existing air license. These boilers and heaters are existing units that were previously believed to have individual heat input ratings less than 1.0 MMBtu/hr, thus they were classified as insignificant. Based on the findings of a recent inventory of fuel burning devices at the Southwest Harbor facility, the following units shall be added to Hinckley's current air license:

Unit Identification	Maximum Heat Input Capacity (MMBtu/hr)	Fuel type	Firing Rate (gal/hr)
Boiler #1 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #2 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #3 (64 Building)	1.6	#2 fuel oil	11.4
Boiler #4 (Fiberglass Building)	1.7	#2 fuel oil	12.3
Boiler #5 (Fiberglass Building)	1.8	#2 fuel oil	13

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New equipment table continued.....

Unit Identification	Maximum Heat Input Capacity (MMBtu/hr)	Fuel type	Firing Rate (gal/hr)
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Service Spray Booth)	1.3	Propane	14.4

B. Application Classification

An application is considered major depending on whether or not the emissions increases are greater than the significant emission levels, as defined in Chapter 100. There will be a small increase of emissions from this amendment beyond that what Hinckley is currently licensed to emit. Total actual emission increases, from the addition of the boilers and heaters is less than four tons per year for any one regulated pollutant and less than eight tons per year of total regulated pollutants. Therefore, emission increases are less than significance levels as defined in Chapter 100 of the Bureau of Air Quality's regulations. This application is considered a non-major modification and has been processed as such. However, since the equipment is considered “new” to the air emission license a BACT analysis is required.

III. BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

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Additional Boilers and Heaters

Hinckley operates many small distillate oil fired boilers at their Southwest Harbor facility. It has recently been noted that five of these boilers are greater than 1 MMBtu/hr and thus must be included on the facility's air license. In addition, Hinckley recently added two spray booths that utilize three propane-fired units with individual heat input capacities greater than 1 MMBtu/hr to heat the make-up air. BACT for the oil-fired boilers will be to limit the #2 fuel oil combusted to 150,000 gallons per year, based on a 12-month rolling total. The #2 fuel oil will not exceed a sulfur content of 0.35% by weight. Due to the individual size of the boilers, the combustion of low sulfur distillate fuel oil, and a limit of 150,000 gallons per year, emissions from these boilers are considered small and do not warrant additional pollution control equipment.

The propane fired make-up air units for the spray booths shall meet BACT by limiting the propane fired to less than 150,000 gallons per year based on a 12-month rolling total. The VOC from paints and coatings emitted while the spray booths operate shall be incorporated into the total chemical inventory and VOC emissions calculations Hinckley currently does. The current VOC limit of 35 tons per year will not change as a result of this amendment.

Facility Emissions and Fuel Use Cap

Based on the use of 150,000 gal/year of #2 fuel oil with a sulfur content not to exceed 0.35% by weight (12 month rolling total) and a limit of 150,000 gallons per year of propane, emissions from the facility shall be limited to the following:

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

Pollutant	Tons/yr
PM	0.2
PM ₁₀	0.2
NO _x	2.7
SO ₂	3.8
CO	0.6
VOC	35.0
Single HAP	9.9
Total HAPS	24.9

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ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.

Therefore the Department grants this amendment A-754-71-B-A, subject to the conditions found in air emission license A-754-71-A-N, and in addition to the following conditions:

- (1) The following units shall be added to Hinckley's current air license:

Unit Identification	Maximum Heat Input Capacity (MMBtu/hr)	Fuel type	Firing Rate (gal/hr)
Boiler #1 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #2 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #3 (64 Building)	1.6	#2 fuel oil	11.4
Boiler #4 (Fiberglass Building)	1.7	#2 fuel oil	12.3
Boiler #5 (Fiberglass Building)	1.8	#2 fuel oil	13
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Service Spray Booth)	1.3	Propane	14.4

- (2) Visible emissions from the boilers' stacks shall not exceed 20% opacity on a 6-minute block average. Visible emissions from the propane units shall not exceed 10% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period.

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- (3) Hinckley shall limit short-term emissions from the boilers and propane units to the following:

<u>Pollutant</u>	(Propane units)	(Oil-fired boilers)
	<u>lb/hr *</u>	<u>lb/hour **</u>
PM	0.10	0.23
PM ₁₀	0.10	0.23
SO ₂	0.01	0.68
NO _x	0.37	0.38
CO	0.05	0.07
VOC	0.10	0.02

* Note the calculated maximum lb/hour emission limit is based on the largest propane unit, operating at 2.5 MMBtu/hr.

** Note the calculated maximum lb/hour emission limit is based on the largest oil-fired boiler, operating at 1.9 MMBtu/hr.

- (4) Hinckley shall limit annual #2 fuel oil use to 150,000 gallons with a maximum fuel sulfur content of 0.35% by weight, based on a 12 month rolling total. The facility shall keep fuel receipts to demonstrate compliance with the fuel use and sulfur limit. Hinckley shall limit propane to less than 150,000 gallons per year based on a 12-month rolling total. Fuel receipts shall be kept to demonstrate compliance with propane use.
- (5) Hinckley shall maintain the filters on the spray paint booths to minimize PM emissions and keep opacity to less than 5%, based on a 6-minute block average. Hinckley shall keep track of the number of gallons of paints/coatings and the VOC content (lb/gallon) that are used in the spray booths to determine the amount of VOC emissions associated with that process. Monthly paint purchases and use records shall be maintained.

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- (6) This minor revision shall be reviewed for renewal concurrent with air emission license A-754-71-A-N.

DONE AND DATED IN AUGUSTA, MAINE THIS ____ DAY OF _____ 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAHGER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 25, 2002

Date of application acceptance: October 9, 2002

Date filed with Board of Environmental Protection: _____

This order prepared by Edwin L. Cousins, BAQ